

In the United States Bankruptcy Court
For the District of Maryland

In Re: Richard S. McKenna

Case No. 16-20602

Debtor(s)

Chapter 13

* * * * *

MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS

1. This action is brought by Richard S. Mckenna, Debtor, in the above-captioned proceeding, to obtain this Court's permission for the sale of his property free and clear of liens.
2. This Court has exclusive jurisdiction over the property in question under 28 U.S.C. Sec. 1334. This is a core matter.
3. The Debtor owns real property at 11004 Brewers Drive, Perry Hall, MD 21128 (hereinafter referred to as the "Property") and has a contract to sell the Property. A copy of the Sales Contract is attached as Exhibit 1.
4. All liens and encumbrances on the property will be paid in full at closing.
5. The Debtor desires to complete the sale of the Property.
6. This sale of the property will generate funds which will be used towards the current chapter 13 plan.

WHEREFORE the debtor prays that this Court:

- A. Enter an Order permitting the Debtor to complete the sale of the Property free and clear of liens.
- B. And for any other relief as may be requisite.

/S/ James R. Logan
James R. Logan
Attorney for the Debtor
2419 Maryland Ave.
Baltimore, MD 21218
(410) 243-1508

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS AND NOTICE OF MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS and PROPOSED ORDER were mailed first class mail, postage pre-paid on October 14, 2019 to the below listed parties:

Richard S McKenna Jr.|11004 Brewers Drive|Perry Hall, MD 21128-8950
Attached Credit Matrix

I HEREBY CERTIFY that copies of the foregoing MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS AND NOTICE OF MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS and PROPOSED ORDER were sent electronically via CM ECF on October 14, 2019 to the below listed parties:

Rebecca A. Herr ecf@ch13md.com
Mark David Meyer bankruptcy@rosenberg-assoc.com
Richard Rogers rrogers@cgd-law.com

/s/ James R. Logan
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